IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON INC., PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBIT:

JOINT MOTION TO DISMISS DEFENDANT C.R. BARD, INC. WITH PREJUDICE

Plaintiffs whose cases are listed on the attached Exhibit A and defendant C.R. Bard, Inc. ("Bard") advise the Court that they have compromised and settled all claims between them in this action, including all counterclaims, cross-claims and third party claims. Accordingly, they jointly move the court to dismiss Bard as a defendant in these actions with prejudice, parties to bear their own costs.¹

Respectfully:

By: /s/ Melanie H. Muhlstock Melanie H. Muhlstock Parker Waichman LLP 6 Harbor Park Drive Port Washington, NY 11050 Telephone: 516.466.6500 Facsimile: 516.466.6665

mmuhlstock@yourlaywer.com

COUNSEL FOR PLAINTIFFS on Exhibit A

¹ The parties jointly move to dismiss C.R. Bard, Inc. with prejudice and terminate it from the Court's docket in these matters; the signatures for Bard on this motion relate only to the joint motion. The motion to transfer is made only by the plaintiffs.

/s/ Richard B. North, Jr.
NELSON MULLINS RILEY & SCARBOROUGH LLP
Atlantic Station, 201 17th Street, NW
Suite 1700
Atlanta, GA 30363
(404) 322-6000

Attorneys for Defendant C.R. Bard, Inc.

Dated: ______

EXHIBIT A – LAW FIRM _____

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2.12 ov 02674	Hydron et al.y. C. D. Dond. Inc.
2:12-cv-03674	Hudson et al v. C. R. Bard, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on $\underline{10/30/2018}$, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Melanie H. Muhlstock